#427873

A PRELIMINARY ASSESSMENT

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CROWN CENTRAL PETROLEUM CORPORATION

1622 SOUTH CLINTON STREET

BALTIMORE, MARYLAND

MC-113

Final Report August 1984

Prepared by: Maryland Waste Management Administration

201 West Preston Street Baltimore, Maryland 21201

For:

U.S. Environmental Protection Agency

Region III

6th and Walnut Streets

Philadelphia, Pennsylvania 19106

Crown Central Petroleum Corporation 1622 South Clinton Street Baltimore, Maryland

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Summary and Recommendations

Summary

The Crown Central Petroleum Corporation purchased parcels of land which are presently known as 1622/1632 S. Clinton Street. Crown operated a fuel storage terminal at this site from 1947 through 1968. The property was unused from 1968 through 1970 when Crown leased it to Petroleum Marketing Corporation, a subsidiary of Petroleum Fuel and Terminal Corporation.

Petroleum Marketing operated the site until April of 1978 at which time they sold the site to Petroleum Fuel and Terminal Corporation, who are the present owners and occupants of the site.

During the years of operation, Crown states that common industry practice was to dispose of leaded tank bottoms by weathering and burial. Crown is unable to locate burial pits at this site, nor are they able to supply estimates of materials alleged to have been buried.

When Petroleum Fuel and Terminal took over the site, no weathering areas or burial pits were discovered. An open area at the Northwest corner of the property appeared to be a rubble fill, according to James Thompson, present Terminal Manager, containing ores and slags from the late 19th century copper and steel works.

Since 1978, about 95% of this open area has been dynamically compacted to a depth of six to seven feet and two 175000 bbl storage tanks have been erected.

Recommendations

While it is certain that leaded tank bottoms have been buried on this site, itis impossible to accurately locate burial sites.

This facility is considered a low priority site for a site investigation to determine what wastes remain on site.

POTENTIAL HAZARDOUS WASTE SITE

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IL SITE NAME AND LOCATION							
O1 SITE NAME (Logal commen, or description name of Eq.		102 STREE	AQUITE NO. OF	SPECIFIC LOCATION K	ENTIFIER		
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Crown Central Petroleum Corporat	ion			iton Street			
a ary			33 2P COOR		City	CCDE DIST	
Baltimore		MD	21224	Baltimore	CILY		
09 CCCADINATES LATITUDE LONGITUDE 1 3 9 1 6"	2 4'			•			
From intersection of Boston and approximately two blocks to si	d South C	linton	Streets	proceed sou	th on C	linton Street	
III. RESPONSIBLE PARTIES				·			
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Crown Central Petroleum Corporat	ion	<u> </u>		rles Street			
Baltimore		MD	21201	08 TELEPHONEN (301) 539-			
Petroleum Fuel and Terminal Corpo	ration	08 STREE	South C	linton Stree	t		
Baltimore		10 STATE MD	21224	(301) 342			
13 TYPE OF OWNERSHIP (Chest one) J. A. PRIVATE J. B. FEDERAL: J. F. OTHER:	(Agenty name)		. XXC. STAT	TE ED.COUNTY	C E MUI	NCIPAL	
I A. RCPA 3001 DATE RECEIVED: MONTH CAY 7548	B. UNCONTROL	ED WAST	E SITE::::#CLA ::	DE CATE RECEIVE	o: <u>6 ,5</u>	.81 CC. NONE	
IV. CHARACTERIZATION OF POTENTIAL HAZARC		······································		· · · · · · · · · · · · · · · · · · ·	, , , , , , ,		
VY USD DATE Q (16 / 83 GA.EPA	E 8. EP.	A CONTRA	CTOR X		D. OTHER	CONTRACTOR	
i ·	TOR NAME(S):		· · · · · · · · · · · · · · · · · · ·				
☐ A. ACTIVE XXB. INACTIVE ☐ C. UNKNOWN		947	! 1968	C VE 16	UNKNOWN		
Crown Central Petroleum Corporation indicates that leaded gasoline tank bottoms ((KO52)Lead) were disposed on site by weathering and burial.							
Potential for the contamination exists due to the proximity of	and poll	ition the	of the Pa	itapsco Rive	r (Inne	r Harbor)	
V. PRIORITY ASSESSMENT							
O1 PRICATTY FOR INSPECTION (Check one, if high or measure a creeked, come A HIGH Inspection required promothy) [Inspection required]	ANG. LOW (Insuection arm		□ 0. NO			Mare Parriery	
VI. INFORMATION AVAILABLE FROM						 	
3	2 OF (Agency Organ	(3450)				O3 TELEPHONE NUMBER	
1 0		-					
Gregory Yawman	Crown Cen	-	etroleum	Corporation	ľ	801) 539-7400	

EPA Potential Hazardous Waste Site Identification and Preliminary Assessment Addendum

III. Responsible Parties

Crown Central Petroleum Corporation, 1 N. Charles Street, Baltimore, Maryland 21201, was the owner and operator of a site located at 1622 South Clinton Street from 1947 to 1968. The site is presently owned and operated by Petroleum Fuel and Terminal Corporation, a subsidiary of the Apex Oil Company.

IV. Characterization of Potential Hazard

O4. Description of substances possibly present, known or alleged; Crown Central Petroleum Corporation was unable to locate the site of disposal or to estimate quantity of material disposed.

Attached correspondence reflects that material was definitely buried at the Clinton Street site.

See also attached monograph concerning weathering and burial of tank bottoms.

SE	A		PRELIMINARY	IDOUS WASTE ASSESSMENT EINFORMATION	SITE	L IDENTIFICATI	
II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS							
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TI. SOUNCE	3 OF INFORMATION ICIE						
CERCLA report submitted by Crown Central Petroleum Corporation							

LIDENTIFICATION

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IL HAZARDOUS CONDI	TIONS AND INCIDENTS			
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POTENTIAL HAZARDOUS WASTE SITE

I. IDENTIFICATION

PART 3 - DESCRIP	PRELIMINARY ASSESSMENT TION OF HAZARDOUS CONDITIONS AND INCIDEN	TS OI STATE 02	STE NUMBER
HAZARDOUS CONDITIONS AND INCIDENTS			
I _ J. DAMAGE TO FLORA A NARRATIVE DESCRIPTION	02 CI OBSERVED (DATE:)	CI POTENTIAL	CI ALLEGED
C. X. DAMAGE TO FAUNA L NARRATIVE DESCRIPTION (Means numbers) of absorbing	02 C OBSERVED (OATE:)	[] POTENTIAL	C ALLEGED
T L CONTAMINATION OF FOOD CHAIN NARRATIVE DESCRIPTION	02 C OBSERVED (DATE:)	C POTENTIAL	C ALLEGED
		OOTCATAL	Cauron
M. UNSTABLE CONTAINMENT OF WASTES (Sour production of the product	02 C OBSERVED (OATE:) 04 NARRATIVE DESCRIPTION	© POTENTIAL	C ALLEGED
1 C. N. DAMAGE TO OFFSITE PROPERTY 4 NAPPATIVE DESCRIPTION	02 C OBSERVED (DATE:]	☐ POTENTIAL	C ALLEGED
		ZXPOTENTIAL	CSESSA D
AARPATIVE DESCRIPTION	from dike areas to Patapsco River	-	
T P. ILLEGAL/UNAUTHORIZED CUMPING NAPRATIVE DESCRIPTION	O2 C CBSERVED (OATE:)	☐ POTENTIAL	S ALLEGED
S DESCRIPTION OF ANY OTHER KNOWN, POTE	VITAL, OR ALLEGED HAZAROS		
			·
TOTAL POPULATION POTENTIALLY AFFE	CTEO:		
COMMENTS			
			,÷
SOURCES OF INFORMATION :Cite specific referen	nces, e.g., sizie Nes, comple analysis, reportsi		
CERCLA Notificat			
FORM 2070-12/7-31:			·

FIELD TRIP SUMMARY REPORT

This summary should be prepared in conjunction with the Preliminary Assessment Form, (EPA Form T2070-2), so that a proper site rating can be assigned.

Name	of	Site Crown Central Petroleum Corporation
EPA	Case	Number
I.	If s Sect	ite is active, has owner/operator notified EPA in accordance with ion 3010 of RCRA. Yes No
	If Y	es: a) Note EPA I.D. No
-	•	b) Is the site a generator, storer, treater or disposer of hazardous waste? (CIRCLE ONE).
II.	obse a sk	the answers submitted in Part VI (Hazard Description) of EPA Form T2070-2 or ervations warrant a more thorough site investigation/sampling, please attach etch map showing those areas of concern. (i.e.: lagoons, leachate seeps, storage, monitoring wells, etc.).
III.	Plea phon	use list site contacts and accompanying inspectors; include name, title and numbers. 9/16/83 James Thompson, Terminal Manager, Petroleum Fuel and
•	Ter	minal Corporation (301)-342-7800
	9/2	9 Crown Central Petroleum Corporation, Corporate Offices, Gregory Yawman,
• '	Sha	ron Kirk, Attorney - 539-5118
IV.	Site	e observations: (attach a topo map). USGS 7½ quad. attached (portion thereof)
		Population within 1000 ft. of the site is (CHECK ONE)
	٠.	 0-10 people Three people occupy residence at 1603 S. Clinton Street 10-100 people greater than 100 people Employees of various industries in area
	В.	List surrounding land use: (woodlot, agricultrual, playground, industrial, etc.)
		North: Industrial - Exxon terminal
		South: Industrial - Gulf terminal
		East: Industrial (1 residence & 1 food shop) - Exxon, Petroleum Fuel Terminal
		West: Patapsco River (Inner Harbor)

C.	Wate	er si	upply for area. (CHECK ONE)
	1. 2. 3.	Mun	face intakes (locate on attached map) icipal wells (locate on attached map) estic wells:
	-	a. b.	Approximate number within ½ mile. 14 Locate a minimum of 3 wells on attached map and list below:
٠			Property owner Exxon Exxon
,			Address 3801 Boston Street (see note)
			Phone No. (301) 563-5118
	•		Well records available YES NO YES
•	•	c.	If odor or taste problems are reported please elaborate:
·		-	N/A
	-		
D.	Are YES		face or subsurface, (leachate), drainage areas from site apparent? NO \star If yes:
•		Was	e unusual odors or stains noted? YES NO
		a.	If yes please note area on map.
E.	If:	yes,	eams or receiving waters adjacent to site? YES * NO list observations: (i.echange in benthic community, change in plant diversity, change in color, siltation, etc.). Site location is
con	tigu	ous	with the Patapsco River (Inner Harbor). A storm drain inlet is situated
on	site	dis	charging to Inner Harbor. There is nothing unusual about the adjacent
rec	eivi	ng w	aters.
F.	Sit	e to	pography: (i.eplateau, strip mine ravines, etc.). The site is
sit	uate	d on	created land composed of fill material and is part of a flat, coastal
pla G.		er o	bservations: (i.eerosion, located in flood plain, etc.)
	Sma	11 po	ortion of site is located in the 100 year flood plain of the Pataspco
r	Riv	er (Inner Harbor).

FIELD TRIP SUMMARY REPORT

Page 3

٧.	Were photographs taken? YES * NO If yes: Who has custody of photos?
•	Name: Waste Management Administration, Office of Environmental Programs
	Agency: Department of Health and Mental Hygiene
	Phone No.: (301)-383-6650
VI.	Is a hydrogeological survey for this site attached? YES NO * If no, Section III D of EPA Form T2070-2 must be completed.
VII.	Please attach pertinent copies of reports or data reviewed by inspector: (i.eState monitoring data, consultant reports, etc.).
III.	Name of Inspector: Michael M. Broumberg Waste Management Administration, Office of Environmental Programs, Agency: Department of Health and Mental Hygiene
	Phone No.: (301)-383-6650
	Time on Site: September 16, 1983 (1015 hours)
	Weather Conditions: Sunny with temperature of 72 degrees ^O F

Field Trip Summary Report (Addendum)

1. As concerns Crown Central Petroleum Corporation, the site is inactive. Crown Central Petroleum Corporation was a treater and disposer of leaded tank bottoms by weathering and burial.

The present operator of the site, Petroleum Fuel and Terminal Corporation, is a generator (MDD 091810581).

IVAl. Population. The dwelling at 1603 S. Clinton Street is served by municipal water and sewerage according to Mrs. Hoover, Office Manager, Petroleum Fuel and Terminal Corporation.

IVC. Well Information. Since 1973, 14 wells have been installed on Exxon property for oil recovery, seven wells are presently in service. There are no domestic or municipal wells within 1/4 mile of site.

, LS WITHIN 1 MILE CROWN C TRAL PETROLEUM SITE

EXXON COMPANY, U.S.A. - BALTIMORE TERMINAL

OIL RECOVERY WELL SYSTEM MONTHLY OIL PRODUCTION SUMMARY

1ST QUARTER, 1983

(GALLONS OF OIL RECOVERED)

ACTIVE	CUMULATIVE TOTAL VOLUME RECOVERED	MONTHLY	BREAKDOWN - 1ST	CUMULATIVE TOTAL VOLUME RECOVERED	
WELL NO.	(END OF 4TH QTR. 1982)	JANUARY	FEBRUARY	MARCH	(END OF 1ST QTR. 1983)
1*	24,442	248	42	2	24,734
2**	1,193	25	23	0	1,241
5	18,489	883	-478	492	20,342
6	13,141	318	291	346	14,096
7	4,127	323	20	166	4,636
8	26,440	1,470	1,088	4,228	33,226
9	4,214	471	170	80	4,935
TOTALS	92,046	3,738	2,112	5,314	103,210

^{*} Well #1 is presently out-of-service.

^{**} Well #2 is in service, but oil production was negligible in March, 1983.

PERFORMANCE OF A PRELIMINARY ASSESSMENT

١.	Information	Review

a.	Hyd	rology
	1.	Fault Zone N/A
	2.	Karst Zone N/A
	3.	100 Yr. Flood Plain See attached floodplain map
	4.	Regulated Floodway N/A
	5.	Wetland N/A
	6.	Recharge Zone N/A
	7.	Soil Characteristics Arundel formation. Clay facies 0.5 to 10 meters
	•	thick. Immediate shoreline is artificial fill.
	8.	Direction of GW/SW Flow Surface water flows to Patapsco River via
		runoff and storm drains. Groundwater is in an unconsolidated aquife
	9.	Depth to Ground Water Varies 50-300'
	10.	Use of GW N/A
	•	
	11.	Aquifer Yield N/A
	12.	Distance to GW/SW Use There is an oil recovery well system on Exxon
		terminal within 1/4 mile
	13.	Recharge/Discharge Area N/A
	14.	Site Slope Flat coastal plain slope 0° to 5°
	15.	SW Intakes N/A
	_	

Miller (August)

1..

o.	Flora/Fauna			
	1.	Endangered Species N/A		
	2.	Indicator Species N/A		
	3.	Critical Habitat N/A		
э.	Sit	e History		
	1.	State/Local Chronology of Events		
		See attached narrative		
•				
•				
		a. NPDES 80-DP-1688 b. SPCC Plan Submitted with oil permit number		
		b. SPCC Plan Submitted with oil permit number		
		c. State Permits		
		d. Air Permits X01923-00026		
,	3.	Legal Action N/A		
	4.	Sampling Results N/A		
	-			
d.	Kno	own or Alleged Hazards		
	1.	Illness Clusters None		
	2.	Cancer Studies None		
	٦.	Helath Dept. Records None		

Page	14	ORIGINAL
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	4.	Fish Kills None
	5.	Worker/Non-worker Injury None
Adn	ninis	trative Information
a.	Fac	ility Name Crown Central Petroleum Corporation
b.	Add	ress 1622 S. Clinton Street, Baltimore, MD 21224
c.	Lat	itude 39 % 16 " 34" / longitude 76 % 35" 45'
d.	Res	ponsibile Party
	1	Owner Crown Central Petroleum Corporation, I. N. Charles St., Balto, M.
	2.	Realty Company N/A 21201
	3.	Generators N/A
e.	Тур	e of Operation
•	1	Generator
		a. Waste Type/Source/Amount
		Leaded tank bottoms from tank cleaning - quantity unknown b. Waste Disposition Buried on site
	2.	Storage N/A
	3.	Treatment/Disposal N/A
•	J (a. Incineration
		b. Landfill
		c. Landfarm
		d. Biological Treatment
•		e. Chemical Treatment
		f. Deep Well Injection
		g. Surface Impoundment_

f.	Site Activity Status
	1. Active
	2. Inactive X
g.	Personnel Present During Inspection
	1. Name James Thompson /
	2. Address 1622 S. Clinton Street, Balto, MD 21224 /
	3. Work Phone (301) 342-7800
•	4. Title Petroleum Fuel and Terminal Manager /
h.	Inspection Information
	1. Access
	a. Warrant
	b. Permission By Mr. Thompson
	2. Photographs
	a. Permitted χ
	b. Prohibited
	c. Other
Fie	eld Evaluation
a.	Evidence of Contamination
	1. Soil None
·	2. Runoff None
٠	3. Spills None
	4. Air Emmissions
	5. Erosion None
	6. Ponding None
	7. Charred Areas None
b.	Maintainance, operation of run-off collection and control systems
	Storm drains feed to oil separator which discharges to Patapsco River.
	Routinely maintained.
c.	Demographics (Refer to Field Trip Summary Report, Section IV.,

Site Observations.

3.

Site History

Crown Central Petroleum Corporation purchased several parcels of land which are known as 1622 S. Clinton Street. See Baltimore City land records MLP 6772/203 and MLP 7546/323.

Crown Central Petroleum Corporation operated a terminal at this site from 1947 to 1968. According to Crown, the acceptable industry practice at that time for disposal of leaded tank bottoms consisted of weathering followed by burial. The terminal was unused from 1968 to 1970 when it was leased to Petroleum Fuel and Terminal Corporation, who subsequently bought the property in 1973. Petroleum Fuel and Terminal demolished a metal shed and built tanks 175-15 + 175-18 (see site drawing).

Page 1/MICROFILMED (fied) - AUG 10 1981

MR. G. L. SHAW

DATE MAY 27, 1981

E. P. MAMPE

SUBJECT:

SUPERFUND NOTIFICATIONS

MAY 27 1981,

G. L. SHAW

In accordance with your request a complete and detailed search has been made of all available files, as well as interrogatories with present and former employees, regarding all present and former terminalling and retail facilities.

Attached for your forwarding to the Regulatory Affairs Group is a summary describing the locations where sludge was disposed of and the approximate time period when these events occurred. It also notes which present or past employee provided this information.

AL THE STATE OF TH The attached recap sheet reflects that sludge burial definitely occurred in Curtis Bay, Clinton Street (Baltimore), Richmond, Norfolk, Roanoke, Charlotte, Spartanburg, Doraville and Birmingham.

We also forward the individual responses obtained from each district that reflects detailed information as to the total number of employees interviewed.

We suggest that the physical preparation of the notification forms, in accordance with the applicable regulations of the superfund. be made and submitted to the appropriate Federal Department by Mr. Mampe's group.

Q.M.d.le

AMD/kdb

Enclosure

cc: Mr. P. B. Onderdonk, w/att.

TERMINAL OPERATIONS DEPARTMENT SUPERFUND NOTIFICATION MAY, 1981

(Med) MAY 27 1981

MICROPHI

E. P. MAMPE AUG 10 1

Location where Leaded Tank Bottoms are Buried

Employee Interviewed

Description

MARYLAND

Clinton Street

J. Gibson

Leaded sludge bottoms were deposited throughout terminal by burial or spreading method from 1947 thru 1968.

5000 Pennington Ave. Baltimore, Md. 21226

J. Gibson

Leaded sludge bottoms were spread over west side dike wall and tank bottom areas from 1968 thru 1974.

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(1, 9,0)

MAY 21 1981

O MR. J. BRIGHT

MAY 27 1981

DATE

MAY 20, BANGET

E. P. MAMPE

MICROFILMED

AUG 10 1981

SUBJECT: SUPERFUND NOTIFICATIONS

As a follow up to my letter of 5/11/18 (attached) the Curtis Bay Terminal if files have been researched again by the undersigned. Attached please find:

- (1) PO # 9-2018 which is indicative of tank cleaning performed by Atlantic Welders, Inc. (sub contractor Northeast Welders) on 8/21/79. Tank #5 leaded gasoline was cleaned for unleaded storage.
- (2) P0 # 0-2110 which is indicative of tank cleaning performed by J & L Industries, Inc. on 7/11/80. Tanks #2 and #3 leaded premium were cleaned for unleaded xtra.
- (3) PO # 0-3561 which is indicative of tank cleaning performed by J&L Industries, Inc. on 10/30/81. Tank #1 leaded regular was cleaned for unleaded xtra. Three 55 gallon drums of leaded sludge wastes were transported to Chemical Waste Management, Emelle, Alabama by J&L Industries under current RCRA Guidelines.
- (4) Drawing No. D-4-402 of Curtis Bay Terminal piping plot plan and key plan indicates sludge pits located between Tank #1 and Tank #2. In an interview with J. Gisbon (34 year man) on 5/11/81 he indicates that leaded sludge has not been buried at Curtis Bay since Crown took over in 1968. Per J. Gibson leaded sludge was spread over west side dike wall to air out. I believe drawing indicating sludge pits is a carry over from old Tidewater Oil Co. blue prints prior to Crown's existence.

J.R. Funk

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JRF/ja

cc: T.R. Daly

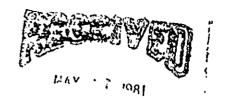
AUG 10 1981

O MR. T.R. DALY

DATE MAY 11, 1981

Susjecti

EPA REPORTING REQUIREMENTS LEADED SLUDGE



E. P. MAMPE

CLINTON STREET TERMENAL

Per I. Gibson - current employee, from 1947 to 1968 leaded tank bottoms were deposited throughout Clinton Street terminal. Both burial and spreading methods of deposit were used.

CURTIS BAY TERMINAL

1968 1974 Per J. Gibson leaded sludge was spread over west side dike warf and tankibottom areas. Since 1974 through October, 1974 contractors were hauling tank bottoms sludge away from terminal to points unknown.*

Since Nov. 1980 Tank #1 was cleaned and leaded sludge wastes were transported to Chemical Waste Management, Emelle, Alabama under current RCRA guidelines.

 \star Contractors used during this period were L. Nadwodny & Sons, Northeast Welders, and J & L Industries.

J.R. Funk

JRF/ja

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MR. E. P. MAMPE

DATE APRIL 29, 1981

E. P. MAMPE

SUPERFUND LEGISLATION - NOTIFICATION REQUIREMENTS

I have no direct knowledge nor records indicating hazardous waste disposal by Crown. When I handled product supply during the 1950's I was told by terminal personnel that they would have to lease special equipment to clean inside a tank and would probably bury the studge. These comments were from our Norfolk and Clinton Staterminals Later comments were that tank cleaning was done by contractors.

J. Horner

Manager-Joint Ventures

CJH:1st

cc: Mr. G. W. Jandacek

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METHODS OF DISPOSING OF SLUDGE FROM LEADED GASOLINE STORAGE TANKS

H. K. BALL

ETHYL CORPORATION

RELEASE AFTERNOON PAPERS TUESDAY, MAY 14

METHODS OF DISPOSING OF SLUDGE FROM LEADED GASOLINE STORAGE TANKS †

H. K. BALL*

ABSTRACT

For many years sludge from leaded gasoline storage tanks has been successfully disposed of by burial. Recently, inquiries have been received from a number of oil companies asking for an alternate method of sludge disposal. Available space for sludge pits is being exhausted, and in some areas high water tables offer disposal problems.

Various methods of sludge disposal were studied, including roasting, chemical treatment, leaching, etc. These methods, although effective, all have drawbacks.

Since the early 1930's, the potential toxicity of sludge from leaded gasoline storage tanks has been recognized. Therefore, it has been necessary to dispose of sludge by a method which would avoid harmful effects both from skin contact or inhalation of its vapors. Burial met these requirements.

In recent years, however, an increasing number of inquiries have been received from oil companies asking for an alternate method of sludge disposal because available space for sludge pits is being exhausted and in some areas high water tables create disposal problems.

In looking for alternate methods of sludge disposal, the basic requirements could be defined as follows:

- 1. Sludge should be reduced in the least possible time to a nonhazardous condition.
- 2. The method should be economical and should apply to tanks in all areas—refinery, terminal, bulk storage, etc.
- 3. The method should require no particular skill or technical assistance to perform it safely.

Possible methods for disposing of sludge were considered as follows:

- 1. Chemical Methods (applied after removing sludge from tank)
 - a. Aqueous potassium permanganate.
 - b. Sodium hypochlorite.
 - c. Chlorine in acetic acid.
 - d. Iodine solution.
- 2. Thermal Methods
- a. Ignition: Place a thin layer of sludge into a shallow but long and wide trench, cover with kerosine, and ignite with a torch. The heating must be for a sufficiently long period of time to vaporize all liquid from the sludge and heat the dried mass to approximately 150 C.
- b. Roasting: Place contaminated sludge on a large steel plate and heat with a flame to 150 C to 200 C. Heating may be applied in any manner.

* Ethyl Corp., New York, N. Y.

5 Presented to a session on operating practices during the
28th Milycar Meeting of the American Petroleme Institute's
Dividen of Refining, in the Genjamia Prankin Hotel, Unitadelpola, Pa., May 14, 1963; presiding, W. T. Askew, Sun Oil Co.,
Philadelphia, Pa.

It was learned that the tetraethyllead would dissipate after spreading leaded sludge in a 3-in, layer. From tests that have been conducted to date, it appears that a weathering period of 30 days is adequate to reduce most sludges to a lead level of below 20 ppm, which is considered safe. Factors such as freezing westner could extend this period somewhat depending upon conditions.

Data are still being accumulated to further support this program.

- 3. Physical Methods (Weathering Sludge): Spread sludge in a thin layer and allow exposure to the elements.
- 4. Combination of Preceding Methods: Weathering followed by ignition or roasting.
- 5. Miscellaneous Methods: A host of other chemical decontaminants such as sulfuryl chloride in kerosine, hydrochloric acid, hydrogen peroxide, etc. were rejected because of secondary problems associated with use of these decontaminants.

Decontamination of sludge prior to removal from the gasoline storage tank (chlorine in the water wash) was rejected because of corrosion problems.

Advantages and Disadvantages of Various Methods

In the course of our investigations, it was agreed that:

- 1. Decontaminating sludge with chemicals (chlorine in acetic acid, iodine in potassium iodide solution, bleach, and potassium permanganate) is only partially effective and quite expensive. The chemicals react with other components of gasoline tank sludge and lose some of their effectiveness. Thorough mixing is essential for proper contact. This method is not considered feasible because of the difficulty of producing intimate contact of chemicals with sludge, the possible hazards of handling the chemicals, their cost, manpower requirements, and special equipment that may be required.
- 2. The most effective methods for decontaminating gasoline storage tank sludge are "thermal methods." Heating sludge to 200 C for 20 min after all moisture is removed reduces the tetraethyllead (TEL) content down to 0.00002 percent by weight. Heating may be carried out in a number of ways. However, the "thermal method" is only applicable when special facilities are available. The method may well require the removal of the sludge to a remote location involving rehandling of the material. Except under special circumstances, the economics do not appear good.

3. Spreading studge in a thin layer on the ground and allowing it to "weather" has been proven an effective procedure for decontaminating studge. Tests show that under Gulf Coast weather conditions, this method was superior to chemical treatment. This also proved true in mid-Continent area tests. In colder parts of the country weathering may be less effective as the studge is in an inactive state because of low temperatures. However, as the weather moderates the weathering will continue.

Chemical Methods

The chemical methods were tested by removing portions (125 g each) from a large sludge sample and analyzing for TEL before and after treatment by methods shown in Table 1. The results from this test (Table 1) demonstrate that treating with halogens (which react instantly when in contact with TEL), potassium permanganate, and bleach considerably reduces the TEL content. However, in no case did the decontaminants remove all TEL.

A secondary problem presented itself in that all chemical decontaminants reacted with other components of sludge, presumably iron in its lower state of oxidation and organic petroleum compounds. This tends to use up the decontaminant.

Mixing sludge with chemical decontaminants appears to be necessary to improve contact with TEL. When potassium permanganate crystals were placed on the surface of sludge contained in a glass vessel, solution and diffusion of permanganate was extremely slow and not complete. Furthermore, the dilute permanganate solution was reduced by impurities in sludge more rapidly than it reacted with TEL.

Further tests to decontaminate sludge with potassium permanganate (1 lb permanganate to 99 lb sludge) proved unsuccessful. Even after stirring for 1 hr the TEL content was only reduced to 0.0022 percent by weight. Also, all potassium permanganate was reduced by this particular sludge sample. Based upon a cost of potassium permanganate at 26 cents per pound, this method appears to be quite expensive (approximately \$8.50 per cubic yard of sludge for permanganate only. The equipment and labor costs would be even higher).

TABLE 1—Decontamination by Chemicals of Gasoline Storage Tank Sludge

Decontaminant	Active Part of Decontaminant, 1 Part to 99 Parts Sludge (Weight)	Time	Unreacted TEL Percent of Sludge (Weight)
None (control sample)	•••	• • •	0. 0120
acetic acid lodine-potassium	Chlorine	3	0.0022
iodide	Iodine	3	0.0006
permanganate	Permanganate	3	0.0023*
Bleach	Bleach	3	0.0049

^{*}Constant stirring of a similar mixture for 1 hr resulted in a value of 0.6022 percent.

The addition of 0.1 percent by weight TEL to a single sample of sludge originally containing approximately 0.01 percent by weight TEL was readily decontaminated with chlorine in acetic acid to 0.0025 percent by weight of TEL. Apparently, TEL added to sludge is easy to decontaminate whereas TEL originally present in sludge is more difficult to decontaminate.

Thermal Methods

Thermal methods of rousting and ignition were tested and found to be effective, especially the former. A 300-g sample of sludge and a 2-lo sample of sludge were placed into steel trays and heated for 1 hr and 20 min. The temperature of the sludge remained below 100 C for the first hour (because of water on the sludge). During the next 20 min the temperature increased to 150 C on the surface and 200 C on the bottom layer.

The TEL content dropped to 0.00001 and 0.00002 percent by weight, respectively. This treatment appeared to be very promising because TEL and all other organic lead compounds are completely destroyed by heating.

The ignition method was tested by placing a 1-inlayer of wet sludge * in a tray and covering it with a thin layer of kerosine. The kerosine was then ignited. A relatively large volume of kerosine (1 volume kerosine to 4 volumes sludge) was needed to volatilize the moisture and reduce the TEL content to 0.0002 percent by weight. Two additions of kerosine were required to remove the moisture, and a third addition was necessary to increase the temperature of the sludge to a maximum of 145 C.

Burning air-dried sludge * with a kerosine and oil mixture reduced the TEL content to 0.00003 percent by weight. The use of kerosine only is not very satisfactory when using a deep bed of sludge (2 in.). Kerosine liquid and vapor prevent a rapid rise in the temperature of the sludge. The sludge bed acts as a wick, and if the temperature of the combustible vapor is not great enough, thermal decomposition of TEL is very slow. The use of a fuel with a higher boiling point is more effective for increasing the temperature of the sludge. For this reason, heating sludge with a flame or "roasting" is preferable to heating with a volatile solvent. The TEL content of a flame-heated sludge * sample (overhead flame) dropped to 0.00001 percent by weight.

Sludge-Weathering Method

In 1955 the Ethyl Corporation started a series of field tests involving the cleaning of leaded gasoline storage tanks. We were interested in what might be the maximum exposure hazard of lead vapors to personnel in a tank having contained leaded gasoline, and we were also interested in the nature of the sludge being removed from a tank. As a part of our study, sludge samples were sent to our chemical research and development laboratory in Baton Rouge for analysis. Sludge in glass bottles, standing in the laboratory before being analyzed, was found to stratify in layers composed of solids, gasoline, and water. It was further found that by centrifuging these samples, the TEL in the sludge can be removed.

^{* 0.012} percent by weight TEL.

diffused into the atmosphere. Further checking by the laboratory group showed that the level of lead in sludge exposed to the elements (with or without the sun being present) rapidly declined.

For this "weathering" process to be a satisfactory method of decontaminating sludge two questions had to be answered.

1. How low did the level have to be reduced to make the sludge safe?

2. How long would it take?

To answer the first of these it was reasoned that the sludge is safe if it will not contaminate the air above it. Tests were then made to see what the LIA (lead-in-air) values were in the air above "weathering" sludge. The results showed that the values are low at all times, even with no apparent wind. This meant that the sludge, as far as air contamination is concerned, is essentially safe as soon as it is spread in the open. To be on the safe side, however, Ethyl Corporation has set a figure at 20 ppm of organic lead as the limit in the

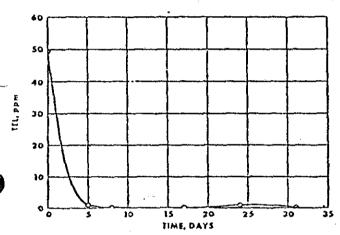


FIG. 1-One-Inch-Thick Sludge Weathered on Ground.

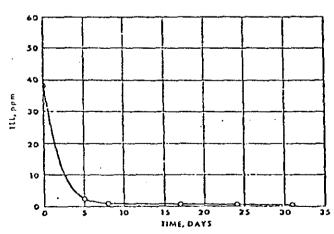


FIG. 2-Two-Inch-Thick Sludge Weathered on Ground.

it has been "weathered."

In the early studies, sludge levels of various thicknesses were tried over a period of time. These are shown in Fig. 1 through Fig. 4. In addition to placing these on the ground, some were placed on steel plate with no apparent difference. These were small-scale tests.

Following this, full-scale tests were carried out at tank cleanings, two of which are shown in Tables 2 and 3.

The LIA values remained almost constant for the duration of both tests even though the lead content of the sludge was disappearing (Table 3).

From the LIA data, it was concluded that there is no danger of inhaling a harmful quantity of lead, provided there is nothing to restrict normal air movement.

The lead content of the sludge in about 3 weeks time dropped 90 percent or more in the 4-in-thick patches (Fig. 3) and 98 percent or more in the 2-in-thick patches (Fig. 2).

Based on data such as this, it was decided that it would be entirely satisfactory to dispose of the con-

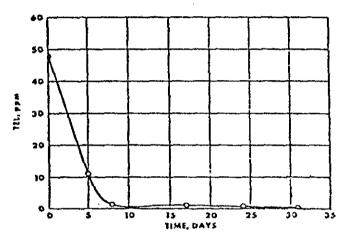


FIG. 3-Four-Inch-Thick Sludge Weathered on Ground.

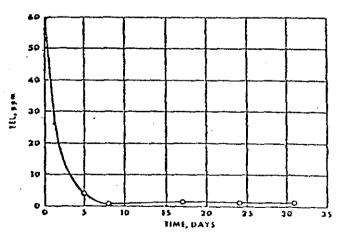


FIG. 4-Two-Inch-Thick Sludge Weathered on Steel Plate.

tamination in sludge by weathering for a period of 30 days.

As this program continues, considerably more data is being accumulated to substantiate our findings. To date all data obtained has proved our original conclusions to be correct.

The following procedure was developed for disposal of sludge so that a uniform method would be followed in arriving at a satisfactory completion of a sludge-weathering program:

1. Location of disposal area:

- a. The site selected for sludge disposal should be in a remote part of the property and within property limits where it can be fenced off from the public. It should be located away from buildings. If the sludge is spread near the tank being cleaned, it should be outside the surrounding firewall, so that the possibility of gasoline vapors affecting the tank cleaning operations will be eliminated.
- b. The disposal area should be located so that personnel working in, on, or around the tank will not get ato the spread-out sludge.
 - c. It can be a bare ground, grass, or concrete surface.
- d. It must be fairly smooth and well drained so that water will not stand on it.
- e. The total area, whether in one or several patches, must be sufficiently large to permit spreading the sludge

TABLE 2-Typical Weathering Results

TEL Content in Sludge in Parts Per Million

Weathering	***************************************		
Time	Two-Inch-	Four-Inch-	
(Days)	Thick Patch	Thick Patch	
ប	38.0	48.0	
5	2.9	10.6	
8	1.1	2.3	
17	0.7	2.0	
24	0.6	0.7	
31	0.5	0.3	

TABLE 3-Typical Lead-in-Air Readings

Micrograms TEL per Cubic Foot of Air

Weathering	Cubic Foot of Air		
Time (Days)	Three Inches Above Sludge	Waist Level Above Sludge	
1	1	1	
2	1	1	
5	1	1	

in a layer not over 3 in. thick. The total area required will, of course, be determined by the amount of sludge in the tank.

- f. It should be so located that air can circulate freely over the surface of the sludge. Exposure to the sun is desirable but not mandatory.
- 2. Remove sludge from the tank in the usual manner following the safety recommendations approved by the American Petroleum Institute.

- 3. The sludge can be moved from the tank to the spreading area in available plant equipment. Wheelbarrows, buckets, or other small containers may be used for moving it a short distance. Dump trucks, lugger buckets, etc. may be used for longer distances. The containers used should be metal. After use, they should be washed thoroughly with water.
- 4. The sludge can be spread with hoes, rakes, or shovels. It should be spread as uniformly as possible to a maximum thickness of 3 in. If the area permits it, a thinner spreading is desirable.
- 5. Personnel who handle and spread the sludge should be dressed in special clothing as recommended for tank cleaning. Masks will not usually be necessary unless there is no air movement and vapors can be detected by odor at face level.
- 6. After the spreading is completed the sludge patch or patches should be roped off and marked so that no one will walk through or stand in the sludge.
- 7. The spread sludge should be left for at least four weeks. After that it may be treated as any other non-toxic waste material. It is satisfactory to remove signs, fences, etc. and leave the sludge in the preselected area permanently. The four-week weathering period applies when the ambient temperature is above 32 F. Therefore, if temperatures under 32 F exist during the period of weathering, this period of subfreezing temperatures should not be included in the recommended four weeks of weathering.
- 8. Whenever the weathered sludge analyzes 0.002 percent by weight (20 ppm) organic lead or less, it may be considered safe and the sludge may then be treated as any other nonhazardous waste material.

To date we have examined over 100 weathered samples taken from tank cleanings and have definite results on 38. These weathered satisfactorily, the organic lead being reduced to less than 20 ppm. A number of samples had to be ruled out because we had no base line to start with, although we have reason to believe that these did weather satisfactorily.

This unquestionably is a radical departure from the early and original method of sludge burial. The new method was brought about by necessity; and, very fortunately, because of the curiosity of our people in our chemical research and development laboratories, we were able to bring to the field a method that, judging from figures received to date, is going to solve a lot of our sludge problems.

We are preparing a more detailed paper on some of the intricacies involved which, hopefully, should be published in several months.

ACKNOWLEDGMENT

The author wishes to acknowledge the assistance of Mr. Louis J. Snyder of the chemical research and development department of Ethyl Corporation who is responsible for directing the laboratory work which was done in connection with this study.

sludge disposal

One of two methods is commonly used for disposing of sludge from leaded-gasoline storage tanks. They are "burying" or "weathering". Both methods are recognized by API RP-2015. There are other effective methods, such as "thermal" methods, but they are not commonly used because special facilities are required.

BURYING—In this method a pit is dug either manually or by bulldozer. The sludge is dumped into the pit and then covered with 1 to 2 feet of fresh earth. This area should be adequately marked so that no one inadvertently uncovers the buried sludge. Experience indicates that buried organic lead compounds decompose very slowly to inorganic materials. If a ditch or trench is dug through the sludge pit, organic lead compounds may be uncovered.

WEATHERING - This method is safe, effective, and economical. Laboratory tests show that organic lead compounds in sludge when exposed to the elements will decompose to inorganic lead compounds. Laboratory and field tests show that if the procedures, as outlined in this section are followed, there will be no special air, soil, or water contamination problem. The basis for this is: (1) The total quantity of organic lead in a sludge weathering bed is small. Concentrations rarely exceed the normal range of 0.1 to 0.4 pounds organic lead per ton of sludge. (2) Regardless of the concentrations or total quantity of lead in the sludge weathering bed, the amount of organic lead exposed to the atmosphere at the surface of the weathering bed is very small. Lead-in-air tests taken over or immediately downwind of the weathering bed indicate that lead-in-air concentrations do not exceed the threshold limit value for organic lead. This indicates the atmosphere in the area is essentially safe from an occupational health hazard standpoint as soon as the sludge is spread. (3) Organic lead compounds are dissolved in the gasoline hydrocarbon fractions of the sludge and do not migrate into water or soil. Thus, the physical properties of organic lead in sludge in the weathering beds are such that vaporization, absorption in water or soil do not constitute a health problem.



ETHYL CORPORATION
PETROLEUM CHEMICALS DIVISION

WEATHERING" PROCEDURE FOR DISPOSAL OF SLUDGE FROM LEADED GASOLINE STORAGE TANKS

1. Location of disposal area:

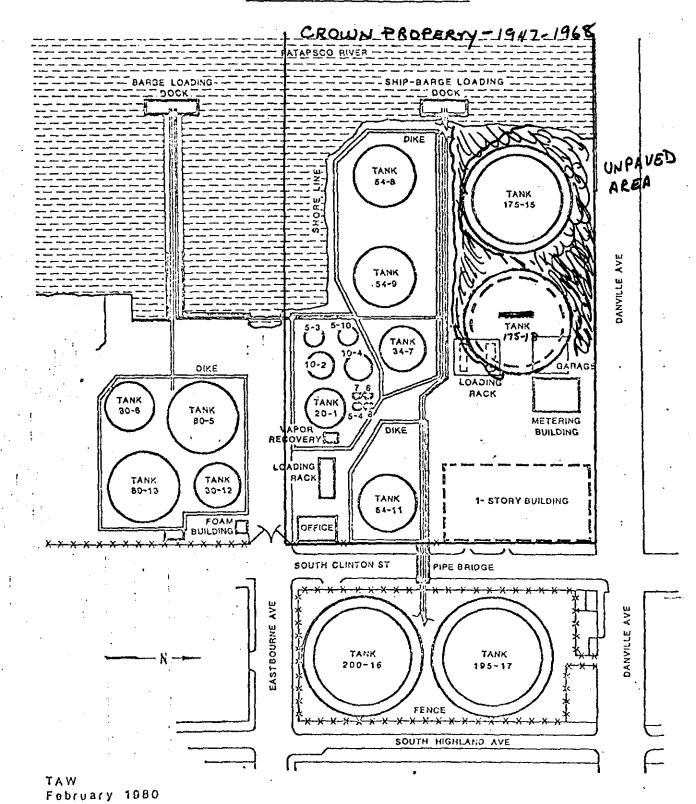
- a. The site selected for sludge disposal should be in a remote part of the tank owners property and within property limits where it can be fenced off from to public. It should be located away from buildings. If the sludge is spread near tank being cleaned, it should be outside the surrounding firewall, so that the possibility of gasoline vapors affecting the tank cleaning operations will be eliminated.
- The disposal area should be located so that personnel working in, on, or around the tank will not get into the spreadout sludge.
- c. It can be a bare ground, grass or concrete surface.
- d. It must be fairly smooth and well drained so that water will not stand on it.
- e. The total area, whether in one or several patches, must be sufficiently large to permit spreading the sludge in a layer not over 3" thick. The total area required will, of course, be determined by the amount of sludge in the tank.
- f. It should be so located that air can circulate freely over the surface of the sludge. Exposure to the sun is desirable but not mandatory.
- 2. Remove sludge from the tank in the usual manner following the safety recommendations approved by API.
- 3. The studge can be moved from the tank to the spreading area in available plant equipment. Wheelbarrows, buckets or other small containers may be used for moving it a short distance. Dump trucks, lugger buckets, etc., may be used for longer distances. The containers used should be metal. After use, they should be washed thoroughly with water.
- 4. The studge can be spread with hoes, rakes or shovels. It should be spread as uniformly as possible to a maximum thickness of three inches. If the area permits it, a thinner spreading is desirable.
- 5. Personnel handling and spreading the sludge should be dressed in special clothing as recommended for tank cleaning. Normally, masks will not be necessary if there is air movement.
- 6. After the spreading is completed the sludge patch or patches should be roped off and marked so that no one will walk through or stand in the sludge.
- 7. While sludge will normally weather within four weeks when the sludge temperature is above 32 degrees F, lead-in-sludge tests should be made before declaring it a nontoxic waste material. The number of days during which sludge temperatures are 32 degrees F or lower should be excluded from the four-week weathering period. If after the four-week weathering period the organic lead content is 20 parts per million or less, 0.002 weight percent, the sludge may then be treated as any other nontoxic waste material. It is then satisfactory to remove signs and fences. The sludge should remain in the preselected area.

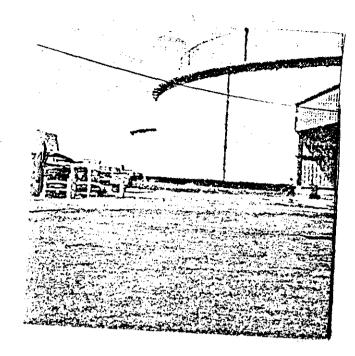


FIGURE 6

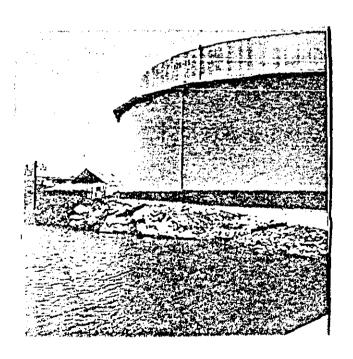
PETROLEUM FUEL & TERMINAL COMPANY

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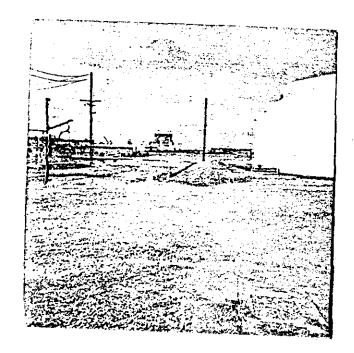




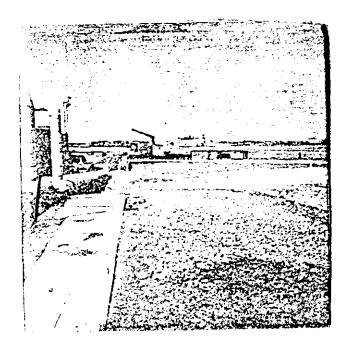
TWO 175000 BBL TANKS ERECTED BY PETROLEUM FUEL AND TERMINAL CORP. OVER "RUBBLE FILL" WHICH ALLEGEDLY EXISTED ON PROPERTY FROM LATE 19TH CENTURY.



"ORIGINAL" SHORELINE AS EXISTED WHEN PETROLEUM FUEL AND TERMINAL CORP. PURCHASED PROPERTY IN 1978 FROM CROWN



VIEW OF SITE PROPERTY LINE WHICH WAS IN EFFECT AT TIME OF SALE BY CROWN. THE CONCRETE SQUARE AT LOWER RIGHT WAS SITE OF BOUNDARY POST. THE AREA TO THE LEFT OF POST WAS SUBSEQUENTLY PURCHASED FROM GULF



THE DOCK IS THE ORIGINAL CROWN STRUCTURE. THE UNPAVED GROUND IS AS ORIGINALLY PURCHASED FROM CROWN